

Morton & Craig LLC
John R. Morton, Jr., Esq.
110 Marter Ave.
Suite 301
Moorestown, NJ 08057
Telephone: 856-866-0100
Attorney for: Credit Acceptance Corporation

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

In re:)	
)	Case No. 19-19346(ABA)
EVETTE SKERRETT)	
)	Chapter 13
)	
)	Hearing date: 7-10-19
)	
)	<u>OBJECTION TO CONFIRMATION</u>
)	

Credit Acceptance Corporation ("Credit Acceptance") a secured creditor of the debtor, objects to the debtor's plan for the following reasons:

- a. **PLAN SILENT:** Credit Acceptance holds a first purchase money security interest encumbering a second 2007 MAZDA MAZDA6 owned by the debtor. The plan is silent as to Credit Acceptance. The plan should be amended to provide that payments are being made directly by the debtor outside of the plan to Credit Acceptance.
- b. **Lien retention:** Credit Acceptance must retain its lien on the vehicle after confirmation and until the loan is paid in full according to its terms. This should be the case even if the case completes before the loan is paid.

c. **Proof of insurance:** Credit Acceptance requests that the debtor provide it with proof that the vehicle is insured as required by 11 U.S.C. 1326(a)(4).

/s/ John R. Morton, Jr.
John R. Morton, Jr., attorney for
Credit Acceptance Corporation

Dated: 7-1-19